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April 23, 2021

VIA ECF

The Honorable Paul G. Gardephe  
United States District Judge for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007-1312

Re: United States v. Kaleil Isaza Tuzman, S8 15 Cr. 536 (PGG)

Dear Judge Gardephe:

We respectfully submit this letter on behalf of Kaleil D. Isaza Tuzman. First, he would like to convey his gratitude to the Court for permitting him to visit with family in Massachusetts and Colorado during the recent Passover holiday. Second, he would like to request the opportunity to travel outside the Southern District of New York to attend his sister Intiya Isaza-Figueroa's baby shower.

Specifically, Mr. Isaza Tuzman respectfully requests the Court's permission to travel to the District of Massachusetts on Friday, April 30; attend the baby shower on Saturday, May 1 at 1pm at Mr. Isaza Tuzman's brother-in-law's family home at 1280 Union Street, Manchester, NH; and then return to the Southern District of New York on Sunday, May 2.

If this leave request is granted, Mr. Isaza Tuzman would stay with his sister Intiya and her husband at 69 Baldwin Street, Apt 1, Charlestown, MA. All other terms and conditions of home detention would remain in place, and Mr. Isaza Tuzman would remain at all times under the supervision of Pretrial Services.

This request has been communicated to Pretrial Services, which responded as follows: "As per our office policy, our office objects to out-of-district multi-day travel requests. This objection is general and not specific to Mr. Isaza Tuzman, who has remained compliant with supervision and has traveled without incident many times in the past. If this leave request approved, we will enter it into the schedule."

Mr. Isaza Tuzman has previously traveled to Colorado, Louisiana, Massachusetts, New Hampshire and Pennsylvania for religious holiday observance and family gatherings, with the Court's permission. *See, e.g.*, ECF Nos. 125, 441, 758, 930, 952, 1033, 1089, 1104,

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1110, 1134. In these cases and every other time Mr. Isaza Tuzman has travelled outside this District as permitted by the Court, he has left and returned without incident.

The government objects to this leave request, as it has to all prior out-of-district requests.

We thank the Court for its consideration.

Respectfully submitted,

Avi Weitzman

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cc. All Counsel of Record (via ECF)  
Officer John Moscato, U.S. Pretrial Services (via E-mail)